

# EXHIBIT A

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : Case No. 08-13555 (JMP)  
Debtors. : (Jointly Administered)  
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**STIPULATION AND ORDER REGARDING WONG OBJECTION TO DERIVATIVES  
PROCEDURES ORDERS**

Lehman Brothers Holding, Inc. ("LBHI") and the other debtors in the above-captioned chapter 11 cases (together with LBHI, the "Debtors"), on the one hand, and Ka Kin Wong, Siu Lui Ching, Chun Ip, Jin Liu, Yin Ying Leung, Lai Mei Chan, and Sing Heung ("Wong Plaintiffs," and, together with the Debtors, the "Parties" and each a "Party"), on the other hand, by and through their respective counsel, hereby enter into this Stipulation and Order and represent and agree as follows:

A. On November 13, 2008, the Debtors, pursuant to Sections 105 and 365 of the Bankruptcy Code (the "Bankruptcy Code") and Rules 6006 and 9019 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") moved the Court for entry of an order establishing procedures for the assumption and assignment (the "Assumption and Assignment Procedures") of derivative contracts (the "Derivative Contracts") the Debtors entered into with various counterparties (the "Counterparties") and the settlement of claims arising from the termination of Derivative Contracts (the "Termination and Settlement Procedures" and, together with the Assumption and Assignment Procedures, the "Procedures") (the "Motion") [**Docket No. 1498**].

B. After a hearing (the "First Hearing") having been held on December 16, 2008 to

consider the relief requested in the Motion, an order was entered on December 16, 2008 [**Docket No. 2257**] granting the relief requested in the Motion (the “Derivatives Procedures Order”) except as to the Derivative Contracts in respect of which the Remaining Objectors (as defined in the Derivatives Procedures Order) filed an objection (the “Remaining Derivative Contracts”).

C. A subsequent hearing on the Motion as to the Remaining Derivative Contracts was held on January 14, 2009 (the “Second Hearing”), and on January 15, 2009, an order was entered supplementing the Derivatives Procedures Order (the “First Supplemental Order” [**Docket No. 2557**] and, together with the Derivatives Procedures Order, the “Derivatives Procedures Orders”).

D. On May 13, 2009, Ka Kin Wong, Siu Lui Ching, Chun Ip, Jin Liu, Yin Ying Leung, Lai Mei Chan, and Sing Heung (the “Wong Plaintiffs”) filed their Motion for Relief from Derivatives Procedures Orders and Objection to Debtors’ Motion for an Order Pursuant to Sections 105 and 305 of the Bankruptcy Code to Establish Procedures for the Settlement or Assumption and Assignment of Prepetition Derivatives Contracts (the “Wong Objection”) [**Docket No. 3566**].

**IT IS HEREBY STIPULATED, AGREED AND, UPON COURT APPROVAL HEREOF, IT SHALL BE ORDERED THAT:**

1. The Wong Objection has been resolved pursuant to the terms of this Stipulation.
2. The terms of the Assumption and Assignment Procedures of the Derivatives Procedures Order shall not be applicable to any Derivatives Contracts related to the series transactions identified on Exhibit 1 attached hereto and described in the Wong Objection.
3. Nothing herein is a determination or admission regarding whether the Wong Plaintiffs are parties in interest in the Debtors’ chapter 11 cases or have standing to object to the

Motion; each of the Parties reserves all of its rights with respect to such issues.

4. Nothing herein shall modify any portion of the Derivatives Procedures Orders except as expressly set forth in paragraph 2 hereof.

5. This Stipulation shall have no force or effect unless and until it is approved by this Court.

6. This Stipulation may be amended, superseded, terminated, or otherwise modified only by a signed writing executed by the Parties.

7. The person who executes this Stipulation by or on behalf of each respective Party represents and warrants that he or she has been duly authorized and empowered to execute and deliver this Stipulation on behalf of such Party.

8. This Stipulation may be executed in counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same instrument, and it shall constitute sufficient proof of this Stipulation to present any copy, copies, electronic copies, or facsimiles signed by the Parties here to be charged.

9. This Stipulation shall inure to the benefit of, and shall be binding upon, the Parties hereto and their respective successors and assigns.

10. This Stipulation shall be governed by the laws of the State of New York, without regard to the application of New York's conflict of law principles.

**AGREED TO:**

Dated: September 22, 2009  
New York, New York

/s/ Robert Lemons

Robert Lemons  
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Attorneys for Ka Kin Wong, Siu Lui Ching,  
Chun Ip, Jin Liu, Yin Ying Leung, Lai Mei  
Chan, and Sing Heung

**SO ORDERED:**

Dated: New York, New York  
September 29, 2009

*s/ James M. Peck*

Honorable James M. Peck  
United States Bankruptcy Judge

**EXHIBIT 1**

<b><u>Series</u></b>	<b><u>ISIN</u></b>
Series 9; Tranche A	XS0189470726
Series 9; Tranche B	XS0189471377
Series 10; Tranche A	XS0193554622
Series 10; Tranche B	XS0193555199
Series 11; Tranche A	XSO195869879
Series 11; Tranche B	XS0195870299
Series 11; Tranche C	XS0195870612
Series 11; Tranche D	XS0195870968
Series 12; Tranche A	XS0200468998
Series 12; Tranche B	XS0200469376
Series 15; Tranche A	XS0208476035
Series 15; Tranche B	XS0208476464
Series 16; Tranche A	XS0209692960
Series 16; Tranche B	XS0209693349
Series 17; Tranche A	XS0214180720
Series 17; Tranche B	XS0214180993
Series 18; Tranche A	XS0213743775
Series 18; Tranche B	XS0213744070
Series 19; Tranche A	XS0220695604
Series 19; Tranche B	XS0220695943
Series 20; Tranche A	XS0225019842
Series 20; Tranche B	XS0225020261
Series 20; Tranche C	XS0225020774
Series 20; Tranche D	XS0225020931
Series 21; Tranche A	XS0227396974
Series 21; Tranche B	XS0227397436
Series 21; Tranche C	XS0227397865
Series 22; Tranche A	XS0236382585

<b><u>Series</u></b>	<b><u>ISIN</u></b>
Series 22; Tranche B	XS0236382742
Series 22; Tranche C	XS0236382825
Series 23; Tranche A	XS0243200143
Series 23; Tranche B	XS0243200812
Series 23; Tranche C	XS0243201463
Series 23; Tranche D	XS0243201620
Series 25; Tranche A	XS0252325005
Series 25; Tranche B	XS0252325690
Series 25; Tranche C	XS0252326318
Series 25; Tranche D	XS0252327399
Series 26; Tranche A	XS0258956738
Series 26; Tranche B	XS0258956902
Series 26; Tranche C	XS0258957207
Series 27; Tranche A	XS0266951804
Series 27; Tranche B	XS0266952281
Series 27; Tranche C	XS0266952794
Series 27; Tranche D	XS0266953255
Series 28; Tranche A	XS0272928879
Series 28; Tranche B	XS0272929091
Series 28; Tranche C	XS0272929414
Series 28; Tranche D	XS0272929687
Series 29; Tranche A	XS0279846223
Series 29; Tranche B	XS0279848609
Series 29; Tranche C	XS0279848195
Series 29; Tranche D	XS0279848948
Series 30; Tranche A	XS0285418215
Series 30; Tranche B	XS0285419023
Series 30; Tranche C	XS0285419619
Series 30; Tranche D	XS0285420468
Series 31; Tranche A	XS0296675605

<u>Series</u>	<u>ISIN</u>
Series 31; Tranche B	XS0296677056
Series 31; Tranche C	XS0296675944
Series 31; Tranche D	XS0296677486
Series 32; Tranche A	XS0311435787
Series 32; Tranche B	XS0311438377
Series 32; Tranche C	XS0311436082
Series 32; Tranche D	XS0311438708
Series 33; Tranche A	XS0318915823
Series 33; Tranche B	XS0318916631
Series 33; Tranche C	XS0318916128
Series 33; Tranche D	XS0318916987
Series 34; Tranche A	XS0338557704
Series 34; Tranche B	XS0338558181
Series 35; Tranche A	XS0348459131
Series 35; Tranche B	XS0348459487
Series 36; Tranche A	XS0363491829
Series 36; Tranche B	XS0363492124